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July 8, 1997

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Policy and Rules Division
Stop Code 1800D

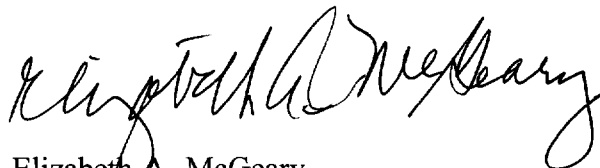
Re: MM Docket Nos. 91-221, 87-8, 94-150, and 87-154
Television Stations KECY-TV, El Centro, California; K40DB, Indio,
California; and K77AV, Palm Springs, California

Dear Mr. Caton:

On behalf of Growth Cities Broadcasting, LLC we submit herewith an original and four copies of the company's response to the FCC's June 17, 1997 Public Notice in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Pacific Media Corporation and Growth Cities Broadcasting, LLC for Television Stations KECY-TV, El Centro, California; K40DB, Indio, California; and K77AV, Palm Springs, California.

Should any questions arise concerning this matter, kindly contact the undersigned.

Respectfully submitted,



Elizabeth A. McGeary

Enclosure

No. of Copies rec'd 0+4
List ABCDE

LMA REPLY FORM

MARKET: EL CENTRO, CA-YUMA, ARIZONA

DMA # 175

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)		
					City Grade	Grade A	Grade B	11/96	2/97	5/97
Brokered Station:	Channel No. & Call Sign	Network Affiliation	Community of License	Owner/ Licensee						
	Channel 9 KECY-TV;	FOX	El Centro, CA;	Pacific Media Corporation	N/A			6	6	7
	Channel 40, K40DB;		Indio, CA;						N/A	
	Channel 77, K77AV		Palm Springs, CA					3	3	2
Brokering Station:	None	N/A	N/A	Growth Cities Broadcasting, LLC	N/A			N/A		

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal may be exercised.	% Time Brokered <u>per week</u>
	3/19/97	5/1/97 - 4/30/08 or the sale of station assets	5/1/97	Earlier of 4/30/08 or the closing date of the sale of station assets and transfer of control of Stations	None	99.8% (167.5 hours/ week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

The Time Brokerage Agreement ("TBA") between Growth Cities Broadcasting, LLC ("Growth Cities") and Pacific Media Corporation has just recently started and is expected to yield a number of public interest benefits as detailed below.

Through the TBA, Growth Cities will be assisting the El Centro station to improve its facilities and the quality of its over-the-air picture to its communities. Growth Cities will also be able to secure quality programming for the station that would not otherwise be affordable absent the time brokerage arrangement.

In Palm Springs, under the TBA, Channel 77 is growing into a new outlet for programming to serve this remote desert community. Instead of retransmitting KECY-TV's programming, Channel 77 is in the process of switching to airing Fox network programming. Growth Cities will be assisting the licensee in acquiring state-of-the-art equipment to accommodate the network programming. This affiliation also will likely create an additional twenty jobs for the community over the next six months.

As the term progresses, additional public interest benefits not yet identified may arise under the TBA.